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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

CRYSTAL HOLMES,

Plaintiff,

v.

ROSALINA HARRIS,

Defendant.

Case No.: 2:18-CV-3739-PSG (Ex)

JOINT REVISED PROPOSED JUDGMENT AFTER JURY VERDICT

[PROPOSED] JUDGMENT AFTER JURY VERDICT

| The parties jointly submit their Revised Proposed Judgment, as follows. DATED: July 9, 2019 Respectfully submitted, BROWN WHITE & OSBORN LLP By /s/ Caleb E. Mason CALEB E. MASON SCOTT L. MENGER Attorneys for Plaintiff CRYSTAL HOLMES DATED: July 9, 2019 SEKI, NISHIMURA & WATASE, LLP By /s/ Parisa Saleki ANDREW C. PONGRACZ PARISA SALEKI Attorneys for Defendant Rosalina Harris Attorneys for Defendant Rosalina Harris Attorneys for Defendant Rosalina Harris [PROPOSED] JUDGMENT AFTER JURY VERDICT | Cas | 2:18-cv-03739-PSG-E | Document 139-1 Filed 07/10/19 Page 2 of 7 Page ID #:2326 |
|--|-----|---------------------|--|
| BROWN WHITE & OSBORN LLP By Street Law Submitted, Brown WHITE & OSBORN LLP By CALEB E. MASON SCOTT L. MENGER Attorneys for Plaintiff CRYSTAL HOLMES DATED: July 9, 2019 SEKI, NISHIMURA & WATASE, LLP By Street Law Submitted, Allower Street Law | | The parties joint | ly submit their Revised Proposed Judgment, as follows. |
| By | | DATED: July 9, 2019 | 1 |
| CALEB E. MASON SCOTT L. MENGER Attorneys for Plaintiff CRYSTAL HOLMES DATED: July 9, 2019 SEKI, NISHIMURA & WATASE, LLP By /s/ Parisa Saleki ANDREW C. PONGRACZ PARISA SALEKI Attorneys for Defendant Rosalina Harris Attorneys for Defendant Rosalina Harris Attorneys for Defendant Rosalina Harris PARISA SALEKI Attorneys for Defendant Rosalina Harris | 5 | | By /s/ Caleb E. Mason |
| Attorneys for Plaintiff CRYSTAL HOLMES 9 10 11 12 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | | | CALEB E. MASON |
| DATED: July 9, 2019 SEKI, NISHIMURA & WATASE, LLP By /s/ Parisa Saleki ANDREW C. PONGRACZ PARISA SALEKI Attornevs for Defendant Rosalina Harris 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | | | Attorneys for Plaintiff CRYSTAL HOLMES |
| By S Parisa Saleki | 1 | DATED: July 0, 2010 | |
| ANDREW C. PONGRACZ PARISA SALEKI Attornevs for Defendant Rosalina Harris 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | 10 | DATED: July 9, 2019 | WITTISE, EEI |
| PARISA SALEKI Attornevs for Defendant Rosalina Harris 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | 11 | | By |
| 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | | | PARISA SALEKI |
| 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | | | Thorneys for Befoream Rosanna Harris |
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| [PROPOSED] JUDGMENT AFTER JURY VERDICT | | | 2 |
| II | | [PR | OPOSED] JUDGMENT AFTER JURY VERDICT |

On July 2, 2019, at the conclusion of trial on a claim for relief by Plaintiff Crystal Holmes against Defendant Rosalina Harris under 42 U.S.C. § 1983, in Courtroom 6A in the matter captioned above, a duly impaneled and sworn jury rendered the verdict set forth in the Special Verdict Form appended hereto as Exhibit **A**. The verdict, having been published to the jury and to the parties and their counsel, the Court having accepted and filed the verdict, and the Court having polled the jury, and the jury having confirmed that this was their verdict, the Court hereby enters judgment on the Complaint in accordance with the verdict.

Judgment is entered in favor of Plaintiff Crystal Holmes against Defendant Rosalina Harris, as follows:

Damages:

\$765,952.00

Punitive Damages:

\$1,500,000.00

Total:

\$2,265,952.00

Plaintiff Crystal Holmes is the prevailing party, as against Defendant Rosalina Harris.¹ Costs of suit are to be awarded to Plaintiff Crystal Holmes pursuant to a duly filed Memorandum of Costs. Any claim for attorneys' fees shall be made by post-trial motion filed in accordance with applicable law.

IT IS SO ORDERED.

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DATED: 7/11/19

By:

HON. PHILIP S. GUTIERREZ U.S. District Court Judge

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¹ The Court previously granted summary judgment in favor of Defendants Dean Harris and Arlani Harris on claims under 42 U.S.C. § 1983 and for malicious prosecution, and in favor of Rosalina Harris on the claim for malicious prosecution. ECF Doc. 82 (May 15, 2019).

FILED CLERK, U.S. DISTRICT COURT JL - 2 2019 PODICTED

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

Case No.: 2:18-CV-3739-PSG (Ex) CRYSTAL HOLMES, SPECIAL VERDICT FORM Plaintiff,

ROSALINA HARRIS,

v.

Defendant.

| 1 | We, the jury in the above-entitled case, find on this special verdict form as follows: | |
|----|--|---|
| 2 | The state of the state of the District Country Holmes' Fourth | |
| 3 | Question 1. Did Defendant Rosalina Harris violate Plaintiff Crystal Holmes' Fourth | L |
| 4 | Amendment right, guaranteed by the United States Constitution, to be free from | |
| 5 | unreasonable arrest without probable cause? | |
| 6 | | |
| 7 | Yes | |
| 8 | | |
| 9 | No | |
| 10 | If you answered "Yes," then continue to Questions 2 and 3. If you answered | |
| 11 | "No," stop here, and have the foreperson sign and date this form. | |
| 12 | | |
| 13 | Question 2. What are Plaintiff's damages? | |
| 14 | | |
| 15 | <u>\$ 765, 952</u> | |
| 16 | * | |
| 17 | Next, answer Question 3. | |
| 18 | | |
| 19 | Question 3. Did Defendant Rosalina Harris act with malice, oppression, or reckless | 3 |
| 20 | disregard of Plaintiff's constitutional rights? | |
| 21 | | |
| 22 | Yes | |
| 23 | | |
| 24 | No | |
| 25 | | |
| 26 | If you answered "Yes," then continue to Question 4 on the next page. If you answered | |
| 27 | "No," stop here, and have the foreperson sign and date this form. | |
| 28 | | |
| | | |

| 1 | Question 4. We impose punitive damages against Defendant Rosalina Harris in the |
|----|---|
| 2 | following amount: |
| 3 | · |
| 4 | s 1.5 million |
| 5 | |
| 6 | Signed Dated: 7/2/19 |
| 7 | Jury Foreperson |
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